

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Modernizing the E-rate)	WC Docket No. 13-184
Program for Schools and Libraries)	

**COMMENTS BY KAJEET, INC.
RELATED TO THE E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING**

Kajeet, Inc., headquartered in Bethesda, MD, is a private company dedicated to making mobile services great for children and all those who love them. Kajeet creates and delivers integrated technologies that provide parents and schools with the ability to manage the mobile devices and services used by their children and students, respectively. Kajeet is known for its award-winning contract-free *smartphone for kids*®, and for its device-agnostic *SmartSpot*™, which provides students with off-campus broadband connectivity that is safe, academically-focused and affordable.

In summary, Kajeet respectfully voices its support for the following key elements of any re-working of the E-rate Program for Schools and Libraries: (1) libraries, schools and school districts should be allowed to use E-rate Program funds to provide broadband connectivity for academic uses regardless of the location of the student, and (2) the cap on the E-rate Program should be raised and funding substantially increased.

Our Comments

How productive would we adults be in the workplace – indeed, how socially connected would we be - if we could only use our mobile devices *while sitting in our workplace*? In our view, not

very. In fact, we'd likely be unemployed, as few employers would tolerate our unavailability and loss of productivity.

We have set a double standard when it comes to our children. We expect them to achieve excellent academic results, to be well integrated into society, and to compete in an increasingly fluid and competitive global economy. And yet, for as many as 40% of our K-12 students, we effectively restrict the use of essential technology tools to the physical grounds of their school buildings and libraries. The moment they leave these facilities, this 40% of the public school population has minimal to zero access to the Internet and all the many educational riches to which it gives access.

Each time a public school teacher in America goes to the board at the front of their class and writes a web address on it - saying as they write, "Take a look at this web site/video/article/application tonight. We'll be discussing it tomorrow." – that teacher, albeit inadvertently, is *actively disadvantaging* a significant number of students in their classroom. Without providing the means for all students to have equal access to the Internet, we adults are complicit in that action and its outcomes. Equal educational access means providing Internet access to all students – not just those of "the 60%;" you and me, for example - that is based on logical, as opposed to geographic, criteria.

The Internet is a vast educational facility that is open and operating independent of time and geography. We should not provide a sizeable portion of our public school students access to *separate* academic facilities and expect them to have *equal* opportunities in life. Depriving certain students of personal mobile access to the Internet shuts them out of the educational facility to which more affluent students have access every evening, weekend, holiday, and vacation day.

Even *referring* to resources on the Internet in many public school classrooms is reminiscent of the discredited (and abhorrent) "separate but equal" legal doctrine. Without universal appropriately-managed mobile educational access to the Internet, we effectively tell 40% of our public school students, "You have a separate kit of tools to help you succeed in school, but you

are equal.” Not providing to certain, less-fortunate public school students the means for off-campus access to the Internet for academic purposes managed by their schools is an inimical form of technological segregation. Children discriminated against in this way have less access to their teachers, have less access to academic tools and resources of previously unimaginable value and variety, are less connected to internships and jobs, and are less connected to their student peers, a proven source of much that is learned in school. As a result, those disadvantaged students suffer, as will we all, the pernicious effects of a diminished education and the economic penalty of the personal un-competitiveness born of this form of discrimination.

Existing mobile services (mobile devices, applications, radio access networks and their integrating operating systems and platforms) have rendered geographic distinctions obsolete when it comes to access to education and educational tools. We live in times where a boy in “remote” Mongolia can join a MOOC on electrical engineering, earn a perfect score, and matriculate at MIT. (*The New York Times Magazine*, 15 Sep 13.) E-Rate program eligibility requirements should be established on logical – as opposed to geographic – criteria. The technology now exists to ensure that publicly subsidized mobile services provided to students can be remotely managed by schools to ensure that such services are used exclusively for educational purposes. In addition, technology exists that enables schools to pay only for educational uses, and parents (or others) to pay for non-educational uses of specific mobile devices (or to have others subsidize educational uses).

Some may say that schools should control the hours of such mobile access (e.g., establishing a ‘usage curfew’ so students are encouraged to get sufficient sleep). This, too, can be easily done. In fact, the City of Chicago Public Schools do just this, turning off mobile devices used by 5th-graders at 9:00 p.m., the hour that the school district deems it appropriate to say, “Lights out!” Mature technology exists to provide mobile policy controls of many types that can be used by schools and districts to effect local school/classroom/grade/student controls of off-campus device and network usage, including those based on time-of-day, content, location, the individual student, and a range of other factors. Flexible mobile policy management controls that support and enhance the purposes of public education, and better student outcomes and performance, are available today. And, as a bonus, they result in significant cost reductions for mobile Internet

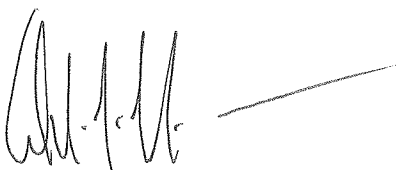
connectivity by, for example, constraining bandwidth consumption to academic purposes and turning off connectivity at bedtime.

Students spend an increasing amount of time in after-school and off-campus activities (sports, community service), and they, like us all, have increasingly longer commutes. Why are digital textbooks, Edline, Edmodo, Wikipedia, www.nasa.gov, an MIT MOOC, and a million other academic resources available only to the affluent during such times?

With respect to additional funding, we point out that the Lifeline program has struggled to ensure that funds only go to eligible purposes. And, yet, that program has no cap. In contrast, the E-rate Program for education is far better managed. Why, if the E-rate Program's eligibility criteria and deployment are well-managed and enforced, should it be capped? We see no logical reason why it should be, particularly if funds are used to provide equal access to education for all of our public school students.

Thank you for the opportunity to comment.

Respectfully,

A handwritten signature in black ink, appearing to read 'Daniel J. Neal', followed by a long horizontal line extending to the right.

--Daniel J. Neal

Parent

CEO & Founder of Kajeet, Inc.